

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
A National Broadband Plan)	GN Docket No. 09-51
For Our Future)	

INTRODUCTION

Chicago Public Schools (“CPS”), the nation’s third largest school district educating over 408,601 students and has been an active participant of the Universal Service Fund since 1998. These are our initial comments submitted on the 9th day of July, in the year of 2010.

1. Streamlining the Application Process

- Technology Plans

- Competitive bidding Process
 - Application Process Streamlining
 - Discount Matrix Streamlining
2. Providing Greater Flexibility to Select Broadband Services
 - Wireless Services Outside of the School
 - Expanded Access to Low-Cost Fiber
 - Expanding Access for Residential Schools that Serve Unique Populations
 - Targeting Support for Broadband Services
 3. Expanding the Reach of Broadband to the Classroom
 - Predictable Internal Connections Funding for More Schools and Libraries
 - Indexing the Annual Funding Cap to Inflation
 4. Creating a Process for Disposal of Obsolete Equipment

COMMENTS

Technology Plan Requirements

In regards to the FCC seeking comments on the proposal to eliminate E-Rate technology plan requirements CPS has always applied for Priority 2 services and for large dollar amounts, so the elimination of the tech plan requirements for smaller Priority 1 applications would not streamline the process for CPS.

- E-rate should require only that applicants have plans approved by certified approvers.
- The requirement to “create” a technology plan prior to filing a Form 470 should be eliminated.

Competitive Bidding Process

In regards to the FCC seeking comments on the proposal to simplify the application process by eliminating the requirement that applicants file a Form 470 and wait 28 days before signing a contract with their selected vendor. CPS would like to suggest the following;

- The process should be determined by state and local procurement guidelines.
- The Form 470 process should be simplified.
- The FCC should consider removing USAC from any responsibility for assessing and enforcing state and local procurement rules.

Discount Matrix Streamlining

In regards to discount matrix calculations CPS would like to request examples of the proposed discount rate in order to get a better understanding of how we as a district could potentially be affected. In regards to the “rural vs. urban” designation the current MSA/Goldsmith method works fine for CPS.

Wireless Services Outside of the School

In regards to wireless service outside of the school CPS feels that the proposal appears to be financially unaffordable for E-Rate. Should The FCC consider this proposal will an increase in funding also be considered so that priority 1 cost are not affected? If not CPS feel that it will not benefit urban school districts.

Expanded Access to Low-Cost Fiber

In regards to expanded access to low-cost fiber CPS does have any comment at this time.

Expanding the Reach of Broadband to the Classroom

In regards to expanding the reach of broadband to the classroom CPS comments are as follow

- We support indexing of annual E-rate cap to coincide with inflation cost and the increasing cost of maintenance.
- We support the elimination of the 2-in-5 because the rule has not served it's intended purpose and has actually caused district to take on larger and more long-term projects.
- We do not support the elimination of support for basic maintenance. CPS relies on the funding of Basic Maintenance to ensure the ongoing operation of our continuously growing network. by eliminating the fund the financial burden of paying for this service would be unfavorable to our current reduced budgets.
- We do not support changing the Priority 2 matrix discounts or per student caps. By placing funding caps on Basic Maintenance some program applicants may experience a shortfall in priority 1 funding which places further constraints on their budgets.

Creating a Process for Disposal of Obsolete Equipment

In regards to Creating a Process for Disposal of Obsolete Equipment CPS supports the equipment disposal rules however we would like to suggest that The FCC re-consider the extra record retention requirements for salvaged equipment.

CONCLUSION

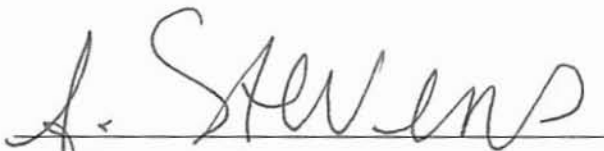
CPS is grateful to be a participant in the E-Rate discount program. We also understand the enormous undertaking the FCC and USAC assume in administering E-Rate. Through it all, CPS wants to ensure the ultimate beneficiaries of E-Rate — U.S. citizens who attend schools and visit public libraries — are always considered when any policy that impacts their access to technology is being considered. In an urban setting, where many students are low to moderate income family members, the school districts are their bridges to technology.



Pamela D. Flowers
E-Rate Manager
Chicago Public Schools

7-9-10
Date

Concurrence:



Arshele Stevens
Chief Information Officer
Chicago Public Schools

7-9-10
Date